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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 TOKYO BROADCASTING SYSTEM,
INC., a Corporation registered in Japan,

16 Plaintiff,

17 vs.

18 AMERICAN BROADCASTING
19 COMPANIES, INC., et al.,

20 Defendants.

21 AND CONSOLIDATED ACTIONS.
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LEAD CASE NO. CV 08-06550-
MAN

(Consolidated with Case No. CV 08-
06622-MAN)

[Consolidated cases assigned for all
purposes to Magistrate Judge Margaret
A. Nagle, Courtroom 580]

**DEFENDANTS' APPLICATION
TO FILE UNDER SEAL**

[Joint Stipulation Re Defendants'
Motion to Compel and Declaration of
Alexander M. Kargher Filed
Concurrently Herewith]

Date Action Filed: October 6, 2008

2010 SEP 15 PM 4:14
U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

FILED

lodged proposed order

Pursuant to Local Rule 79-5.1 and the Stipulated Protective Order entered by the Court in this action on February 1, 2010, Defendants American Broadcasting Companies, Inc. ("ABC") and Endemol USA ("Endemol," jointly "Defendants") hereby respectfully request that the Court order the following documents to be filed under seal:

- TBS_00126462-TBS_00126465 [Exhibit 1, Kargher Decl.]
- TBS_00126455-TBS_00126456 [Exhibit 8, Kargher Decl.]
- TBS_00025945 [Exhibit 9, Kargher Decl.]
- TBS_00053403-TBS_00053404 [Exhibit 10, Kargher Decl.]
- TBS_00024894-TBS_00024895 [Exhibit 11, Kargher Decl.]
- TBS_00024896 [Exhibit 12, Kargher Decl.]
- TBS_00024910-TBS_00024913 [Exhibit 13, Kargher Decl.]
- TBS_00024898-TBS_00024902 [Exhibit 14, Kargher Decl.]
- TBS_00024908-TBS_00024909 [Exhibit 15, Kargher Decl.]
- TBS_00024905-TBS_00024907 [Exhibit 16, Kargher Decl.]
- TBS_00024903-TBS_00024904 [Exhibit 17, Kargher Decl.]
- TBS_00024922-TBS_00024923 [Exhibit 18, Kargher Decl.]
- TBS_00024914-TBS_00024915 [Exhibit 19, Kargher Decl.]
- TBS_00159981-TBS_00159982 [Exhibit 20, Kargher Decl.]

Good cause exists for filing these documents under seal because they discuss confidential and private information that has been designated by Plaintiff Tokyo Broadcasting System, Inc. as "CONFIDENTIAL" and or "HIGHLY CONFIDENTIAL."

Dated: September 15, 2010

GLASER, WEIL, FINK, JACOBS,
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By: /S/ Alexander M. Kargher
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